



Monroe Energy, L.L.C.

4101 Post Road

Trainer, PA 19061

(610) 364-8000

January 9, 2018

Mr. James Rebarchak
Air Quality Program
Commonwealth of Pennsylvania
Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RECEIVED

JAN 29 2018

Air Protection Division

**RE: Monroe Energy, LLC – Trainer Refinery
Fourth Quarter (4Q2017) PADEP VOC Fugitive Monitoring Report
Title V Operating Permit No. 23-00003**

Dear Mr. Rebarchak:

As required by Pennsylvania Code, Title 25, §129.58(f), the Monroe Energy, LLC (Monroe Energy) Trainer Refinery hereby submits the VOC Fugitive Emissions Monitoring Report for the period of October 1, 2017 through December 31, 2017.

This report consists of the following documents:

- Compliance Monitoring Summary Pennsylvania Title 25, Section 129.58.
- Compliance Repair Delay List Pennsylvania Title 25, Section 129.58.
- Compliance Report Repair Delayed History – Components Repaired During Report Period, Pennsylvania Title 25, Section 129.58.
- Compliance Report – Components Added and Deleted During Report Period, Pennsylvania Title 25, Section 129.58.

As required by the Consent Decree H-05-0258, paragraph 236, Monroe Energy is hereby notifying the Department that the report leak rates contained herein for valves and pumps are those applicable regulatory leak definitions defined in Pennsylvania Code, Title §129.58(a).

During the reporting period, all components were monitored in accordance with Monroe Energy's Alternate LDAR Plan Monitoring Schedule and no late repairs were recorded. Also, per the aforementioned Consent Decree, all valves with a leak rate of over 10,000 ppm that required a Drill and Tap were successfully repaired to a leak rate less than 500 ppm and were not placed on Delay of Repair list.

[Type text]

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained herein are true, accurate, and complete.

Should you have any questions or comments regarding this report, please contact Stephani Ski Szymanski, Environmental Engineer and Program Lead, at (610) 364-8073.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey K. Warmann', written over the word 'Sincerely,'.

Jeffrey K. Warmann
CEO & President

Enclosures

Cc: Office of Air Enforcement & Compliance Assistance (3AP20)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

MONROE ENERGY TRAINER REFINERY

4Q2017 PADEP/PAREF QUARTERLY LDAR REPORT

SUMMARY

REPORT COMPLIANCE PERIOD: OCTOBER 1, 2017 THROUGH DECEMBER 31 2017

UNIT	CLASS	MONTH	MONITORED	LEAKED	LATE REPAIR
<u>543 CRUDE</u>					
	PUMP	10	4	0	0
	PUMP	11	4	0	0
	PUMP	12	4	0	0
	RELIEF	11	8	0	0
	VALVE	10	3	0	0
	VALVE	11	1,114	0	0
	VALVE	12	16	0	0
			<u>1,153</u>	<u>0</u>	<u>0</u>
<u>544 CRUDE</u>					
	PUMP	10	15	0	0
	PUMP	11	15	0	0
	PUMP	12	15	0	0
	RELIEF	11	9	0	0
	VALVE	10	5	0	0
	VALVE	11	1,197	0	0
	VALVE	12	1	0	0
			<u>1,257</u>	<u>0</u>	<u>0</u>
<u>544 VACUUM</u>					
	PUMP	10	2	0	0
	PUMP	11	2	0	0
	PUMP	12	2	0	0
	RELIEF	11	7	0	0
	VALVE	11	405	0	0
	VALVE	12	1	0	0
			<u>419</u>	<u>0</u>	<u>0</u>
<u>ALKY</u>					
	PUMP	10	27	0	0
	PUMP	11	27	0	0
	PUMP	12	27	0	0
	RELIEF	11	39	0	0
	VALVE	10	4	0	0
	VALVE	11	3,434	2	0
	VALVE	12	6	0	0
			<u>3,564</u>	<u>2</u>	<u>0</u>

AMINE

PUMP	10	2	0	0
PUMP	11	2	0	0
PUMP	12	2	0	0
RELIEF	10	6	0	0
VALVE	10	359	0	0
		<u>371</u>	<u>0</u>	<u>0</u>

AWWTP

VALVE	10	140	0	0
		<u>140</u>	<u>0</u>	<u>0</u>

BLEND

PUMP	10	18	0	0
PUMP	11	18	0	0
PUMP	12	18	0	0
RELIEF	10	19	0	0
VALVE	10	1,437	0	0
VALVE	11	11	0	0
		<u>1,521</u>	<u>0</u>	<u>0</u>

BOILER

RELIEF	12	1	0	0
VALVE	12	75	0	0
		<u>76</u>	<u>0</u>	<u>0</u>

BOILER 14

VALVE	12	49	0	0
		<u>49</u>	<u>0</u>	<u>0</u>

BOILERS 9 & 10

RELIEF	12	4	0	0
VALVE	10	7	0	0
VALVE	11	5	0	0
VALVE	12	438	0	0
		<u>454</u>	<u>0</u>	<u>0</u>

BUTANE

RELIEF	11	7	0	0
VALVE	11	304	0	0
		<u>311</u>	<u>0</u>	<u>0</u>

DESALT

PUMP	10	10	0	0
PUMP	11	10	0	0
PUMP	12	10	0	0
RELIEF	10	12	0	0
VALVE	10	815	0	0
VALVE	11	8	0	0

865 **0** **0**

DIESEL

PUMP	10	13	0	0
PUMP	11	13	0	0
PUMP	12	13	0	0
RELIEF	10	9	0	0
RELIEF	11	2	0	0
VALVE	10	788	0	0
VALVE	11	21	0	0
VALVE	12	2	0	0

861 **0** **0**

FCC

PUMP	10	25	0	0
PUMP	11	25	0	0
PUMP	12	25	0	0
RELIEF	10	1	0	0
RELIEF	11	34	0	0
RELIEF	12	1	0	0
VALVE	10	5	0	0
VALVE	11	2,317	0	0
VALVE	12	22	0	0

2,455 **0** **0**

FLARE

PUMP	10	3	0	0
PUMP	11	3	0	0
PUMP	12	3	0	0
VALVE	10	1	0	0
VALVE	11	6	0	0
VALVE	12	220	0	0

236 **0** **0**

FLARE GAS RECOVERY

PUMP	10	7	0	0
PUMP	11	7	0	0
PUMP	12	7	0	0
RELIEF	12	20	0	0
VALVE	10	2	0	0

VALVE	11	1	0	0
VALVE	12	1,054	0	0
		<u>1,098</u>	<u>0</u>	<u>0</u>

ISOCRK

CONECT	10	5	0	0
CONECT	11	1	0	0
CONECT	12	1	0	0
PUMP	10	18	0	0
PUMP	11	18	0	0
PUMP	12	18	0	0
RELIEF	10	56	0	0
VALVE	10	3,132	0	0
VALVE	11	4	0	0
VALVE	12	3	0	0
		<u>3,256</u>	<u>0</u>	<u>0</u>

KERO

PUMP	10	9	0	0
PUMP	11	9	0	0
PUMP	12	9	0	0
RELIEF	10	30	0	0
VALVE	10	1,525	1	0
VALVE	11	25	0	0
VALVE	12	3	0	0
		<u>1,610</u>	<u>1</u>	<u>0</u>

LOWLN

PUMP	10	6	0	0
PUMP	11	6	0	0
PUMP	12	6	0	0
RELIEF	10	6	0	0
VALVE	10	576	0	0
VALVE	11	6	0	0
		<u>606</u>	<u>0</u>	<u>0</u>

MARINE

PUMP	10	2	0	0
PUMP	11	2	0	0
PUMP	12	2	0	0
RELIEF	11	10	0	0
VALVE	11	291	0	0
		<u>307</u>	<u>0</u>	<u>0</u>

NAPHTH

PUMP	10	16	0	0
PUMP	11	16	0	0
PUMP	12	16	0	0
RELIEF	12	13	1	1
VALVE	10	12	0	0
VALVE	11	11	0	0
VALVE	12	1,518	0	0

1,602 **1** **0**

PLATFO

COMPR	10	1	0	0
COMPR	11	1	0	0
PUMP	10	10	0	0
PUMP	11	10	0	0
PUMP	12	10	0	0
RELIEF	12	30	0	0
VALVE	10	8	0	0
VALVE	11	5	0	0
VALVE	12	2,185	1	0

2,260 **1** **0**

PRORCL

PUMP	10	1	0	0
PUMP	11	1	0	0
PUMP	12	1	0	0
RELIEF	12	3	0	0
VALVE	12	331	0	0

337 **0** **0**

PROREC

RELIEF	11	12	0	0
VALVE	11	646	0	0

658 **0** **0**

PROSTO

PUMP	10	6	0	0
PUMP	11	6	0	0
PUMP	12	6	0	0
RELIEF	10	20	0	0
VALVE	10	532	0	0
VALVE	11	5	0	0
VALVE	12	1	0	0

576 **0** **0**

REFORM

PUMP	10	8	0	0
PUMP	11	8	0	0
PUMP	12	8	0	0
RELIEF	11	11	0	0
VALVE	10	5	0	0
VALVE	11	827	0	0
VALVE	12	14	0	0

		<u>881</u>	<u>0</u>	<u>0</u>
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SOUR

RELIEF	10	1	0	0
RELIEF	11	2	0	0
VALVE	11	53	0	0
VALVE	12	1	0	0

		<u>57</u>	<u>0</u>	<u>0</u>
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SOUTH TANK FARM

PUMP	10	25	0	0
PUMP	11	25	0	0
PUMP	12	25	0	0
RELIEF	11	1	0	0
RELIEF	12	20	0	0
VALVE	10	114	0	0
VALVE	11	55	0	0
VALVE	12	2,639	1	0

		<u>2,904</u>	<u>1</u>	<u>0</u>
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SRU

RELIEF	10	3	0	0
VALVE	10	77	0	0

		<u>80</u>	<u>0</u>	<u>0</u>
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TAIL GAS

RELIEF	10	3	0	0
VALVE	10	160	0	0

		<u>163</u>	<u>0</u>	<u>0</u>
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TF

PUMP	10	10	0	0
PUMP	11	10	0	0
PUMP	12	10	0	0
RELIEF	12	6	0	0
VALVE	10	3	0	0
VALVE	11	16	0	0
VALVE	12	893	0	0

			<u>948</u>	<u>0</u>	<u>0</u>
<u>ULSG</u>					

PUMP	10	8	0	0
PUMP	11	8	0	0
PUMP	12	8	0	0
RELIEF	10	6	0	0
RELIEF	12	11	0	0
VALVE	10	2,154	1	0
VALVE	11	2,195	0	0
VALVE	12	2,157	0	0

			<u>6,547</u>	<u>1</u>	<u>0</u>
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VACUUM

PUMP	10	2	0	0
PUMP	11	2	0	0
PUMP	12	2	0	0
RELIEF	10	3	0	0
VALVE	10	498	0	0
VALVE	11	1	0	0

			<u>508</u>	<u>0</u>	<u>0</u>
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VGO

PUMP	10	1	0	0
PUMP	11	1	0	0
PUMP	12	1	0	0
RELIEF	10	11	0	0
VALVE	10	626	0	0
VALVE	11	7	0	0
VALVE	12	3	0	0

			<u>650</u>	<u>0</u>	<u>0</u>
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TOTAL:	38,780	7	0
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MONROE ENERGY TRAINER REFINERY
 4Q2017 PADEP QUARTERLY LDAR REPORT
 PLACED ON DELAY OF REPAIR COMPONENTS
 LEAKING COMPONENTS SUBJECT TO PENREF RULE LEAK DEFINITION OF >10,000PPM PLACED ON
 DOR FOR QUARTER
 REPORT COMPLIANCE PERIOD: OCTOBER 1, 2017 THROUGH DECEMBER 31, 2017

UNIT	TAG	CLASS	PLACED ON DELAY
NAPTHA	09342	RELIEF	12/21/2017
			1

DOES NOT INCLUDE CONNECTORS, PER PAREF REPORTING REGULATION

MONROE ENERGY TRAINER REFINERY
 4Q2017 PADEP QUARTERLY LDAR REPORT
 REMOVED FROM DELAY OF REPAIR COMPONENTS
 LEAKING COMPONENTS SUBJECT TO PENREF RULE LEAK DEFINITION OF >10,000PPM REMOVED FROM DOR
 FOR QUARTER

REPORT COMPLIANCE PERIOD: OCTOBER 1, 2017 THROUGH DECEMBER 31, 2017

UNIT	TAG	CLASS	PLACED ON DELAY
PLATFORM	10301	COMPRESSOR	11/6/2017
SOUR	04526	RELIEF	10/16/2017
			2

DOES NOT INCLUDE CONNECTORS, PER PAREF REPORTING REGULATION

MONROE ENERGY TRAINER REFINERY
 4Q2017 PADEP QUARTERLY LDAR REPORT
 REMOVED FROM DELAY OF REPAIR COMPONENTS
 LEAKING COMPONENTS SUBJECT TO PENREF RULE LEAK DEFINITION OF
 >10,000PPM REMOVED FROM DOR FOR QUARTER
 REPORT COMPLIANCE PERIOD: OCTOBER 1, 2017 THROUGH DECEMBER 31, 2017

UNIT	CLASS	ADDED	DELETED
543 CRUDE	CONNECTOR	0	0
543 CRUDE	PRESSURE RELIEF DEVICE	0	0
543 CRUDE	PUMP	0	0
543 CRUDE	VALVE	0	0
544 CRUDE	PRESSURE RELIEF DEVICE	0	0
544 CRUDE	PUMP	0	0
544 CRUDE	VALVE	0	0
544 VACUUM	PRESSURE RELIEF DEVICE	0	0
544 VACUUM	PUMP	0	0
544 VACUUM	VALVE	0	0
ALKY	CONNECTOR	0	0
ALKY	PRESSURE RELIEF DEVICE	0	0
ALKY	PUMP	0	0
ALKY	VALVE	0	0
AMINE	PRESSURE RELIEF DEVICE	0	0
AMINE	PUMP	0	0
AMINE	VALVE	0	0
AWWTP	VALVE	0	0
BLEND	CONNECTOR	0	0
BLEND	PRESSURE RELIEF DEVICE	0	0
BLEND	PUMP	0	0
BLEND	VALVE	10	3
BOILER	CONNECTOR	0	0
BOILER	PRESSURE RELIEF DEVICE	0	0
BOILER	VALVE	0	0
BOILER 14	VALVE	0	0
BOILERS 9 & 10	CONNECTOR	0	0
BOILERS 9 & 10	PRESSURE RELIEF DEVICE	0	0
BOILERS 9 & 10	VALVE	1	0
BUTANE	CONNECTOR	0	0
BUTANE	PRESSURE RELIEF DEVICE	0	0
BUTANE	VALVE	0	0
CRUDE	CONNECTOR	0	0
CRUDE	PRESSURE RELIEF DEVICE	0	0
CRUDE	PUMP	0	0
CRUDE	VALVE	0	0
DESALT	CONNECTOR	0	0
DESALT	PRESSURE RELIEF DEVICE	0	0
DESALT	PUMP	0	0
DESALT	VALVE	0	0
DIESEL	COMPRESSOR	0	0
DIESEL	CONNECTOR	0	0
DIESEL	PRESSURE RELIEF DEVICE	0	0
DIESEL	PUMP	0	0
DIESEL	VALVE	0	0
FCC	COMPRESSOR	0	0

FCC	CONNECTOR	0	0
FCC	PRESSURE RELIEF DEVICE	0	0
FCC	PUMP	0	0
FCC	VALVE	4	1
FLARE	CONNECTOR	0	0
FLARE	PRESSURE RELIEF DEVICE	0	0
FLARE	PUMP	0	0
FLARE	VALVE	0	0
FLARE GAS RECOVERY	COMPRESSOR	0	0
FLARE GAS RECOVERY	PRESSURE RELIEF DEVICE	0	0
FLARE GAS RECOVERY	PUMP	0	0
FLARE GAS RECOVERY	VALVE	0	0
ISOCRK	COMPRESSOR	0	0
ISOCRK	CONNECTOR	0	0
ISOCRK	PRESSURE RELIEF DEVICE	0	0
ISOCRK	PUMP	0	0
ISOCRK	VALVE	1	0
KERO	COMPRESSOR	0	0
KERO	CONNECTOR	0	0
KERO	PRESSURE RELIEF DEVICE	0	0
KERO	PUMP	0	0
KERO	VALVE	2	0
LOWLN	COMPRESSOR	0	0
LOWLN	CONNECTOR	0	0
LOWLN	PRESSURE RELIEF DEVICE	0	0
LOWLN	PUMP	0	0
LOWLN	VALVE	0	0
MARINE	COMPRESSOR	0	0
MARINE	CONNECTOR	0	0
MARINE	PRESSURE RELIEF DEVICE	0	0
MARINE	PUMP	0	0
MARINE	VALVE	0	0
NAPHTH	COMPRESSOR	0	0
NAPHTH	CONNECTOR	0	0
NAPHTH	PRESSURE RELIEF DEVICE	0	0
NAPHTH	PUMP	0	0
NAPHTH	VALVE	4	0
OYF	VALVE	0	0
PLATFO	COMPRESSOR	0	0
PLATFO	CONNECTOR	0	0
PLATFO	PRESSURE RELIEF DEVICE	0	0
PLATFO	PUMP	0	0
PLATFO	VALVE	0	2
PRORCL	CONNECTOR	0	0
PRORCL	PRESSURE RELIEF DEVICE	0	0
PRORCL	PUMP	0	0
PRORCL	VALVE	0	0
PROREC	CONNECTOR	0	0
PROREC	PRESSURE RELIEF DEVICE	0	0
PROREC	VALVE	0	0
PROSTO	CONNECTOR	0	0
PROSTO	PRESSURE RELIEF DEVICE	0	0
PROSTO	PUMP	0	0
PROSTO	VALVE	2	0
REFORM	CONNECTOR	0	0

REFORM	PRESSURE RELIEF DEVICE	0	0
REFORM	PUMP	0	0
REFORM	VALVE	0	0
SOUR	CONNECTOR	0	0
SOUR	PRESSURE RELIEF DEVICE	0	0
SOUR	PUMP	0	0
SOUR	VALVE	0	0
SOUTH TANK FARM	COMPRESSOR	0	0
SOUTH TANK FARM	CONNECTOR	0	0
SOUTH TANK FARM	PRESSURE RELIEF DEVICE	0	0
SOUTH TANK FARM	PUMP	1	0
SOUTH TANK FARM	VALVE	35	1
SRU	COMPRESSOR	0	0
SRU	CONNECTOR	0	0
SRU	PRESSURE RELIEF DEVICE	0	0
SRU	VALVE	0	0
SUNOL	COMPRESSOR	0	0
SUNOL	CONNECTOR	0	0
SUNOL	PRESSURE RELIEF DEVICE	0	0
SUNOL	PUMP	0	0
SUNOL	VALVE	0	0
TAIL GAS	CONNECTOR	0	0
TAIL GAS	PRESSURE RELIEF DEVICE	0	0
TAIL GAS	VALVE	0	0
TF	CONNECTOR	0	0
TF	PRESSURE RELIEF DEVICE	0	0
TF	PUMP	0	0
TF	VALVE	0	0
ULSG	COMPRESSOR	1	0
ULSG	PRESSURE RELIEF DEVICE	17	0
ULSG	PUMP	8	0
ULSG	VALVE	2,199	1
VACUUM	CONNECTOR	0	0
VACUUM	PRESSURE RELIEF DEVICE	0	0
VACUUM	PUMP	0	0
VACUUM	VALVE	0	0
VGO	COMPRESSOR	0	0
VGO	CONNECTOR	0	0
VGO	PRESSURE RELIEF DEVICE	0	0
VGO	PUMP	0	0
VGO	VALVE	4	0
VT	VACUUM TRUCK	0	0
WC	CONTAINERS , DRUMS, ETC.	0	0
WGS	CONNECTOR	0	0
WGS	PRESSURE RELIEF DEVICE	0	0
WGS	VALVE	0	0

TOTAL: 2,289 8